

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

LULA MAE LONG

PLAINTIFF

V.

CIVIL ACTION NO. 3:21-cv-00090-TSL-RPM

MANHATTAN NURSING AND REHABILITATION
CENTER, INC., and JOHN DOES 1-20

DEFENDANT

MOTION TO COMPEL ARBITRATION AND STAY PROCEEDINGS

Defendant Manhattan Nursing and Rehabilitation Center, LLC¹ ("Manhattan") files this Motion to Compel Arbitration and Stay Proceedings. For the reasons more fully set forth in the accompanying memorandum of authorities, Manhattan respectfully requests that the Court order Plaintiff to submit her claims to binding arbitration and dismiss Plaintiff's claims against Manhattan with prejudice.

In support of this Motion, Manhattan submits the following exhibit, which is attached hereto:

Exhibit 1: Arbitration Agreement

WHEREFORE, PREMISES CONSIDERED, Manhattan respectfully requests that the Court compel Plaintiff to submit her claims to binding arbitration and dismiss with prejudice the claims asserted by Plaintiff in this civil action.

¹ Manhattan Nursing and Rehabilitation Center, LLC is incorrectly named in the Complaint as "Manhattan Nursing and Rehabilitation Center, Inc."

This 11th day of February 2021.

Respectfully submitted,

MANHATTAN NURSING AND
REHABILITATION CENTER, LLC

/s/ Davis Frye

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CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed electronically with the Clerk of the Court using the Court's ECF system, which served a true and correct copy of such paper electronically on the following counsel of record:

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ATTORNEY FOR PLAINTIFF

THIS the 11th day of February 2021.

s/ Davis Frye